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July 25, 2025

Honorable Evelyn Padin
United States District Judge
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Re: United States v. Joel Lyons
Crim. No. 22-623 (EP)

Dear Judge Padin:

I represent Joel Lyons in the above-referenced matter. Sentencing is scheduled for September 10, 2025. In advance of sentencing, Mr. Lyons respectfully requests permission to have his five-year-old daughter and 17 year old brother present for the sentencing. Although we recognize that the Court typically does not permit minors to attend, Mr. Lyons can assure the court that his daughter and sibling will not be a distraction in any way during the proceedings.

Thank you for your thoughtful consideration.

Respectfully Submitted,

/s/Ernesto Cerimele
Ernesto Cerimele